

ORIGINAL

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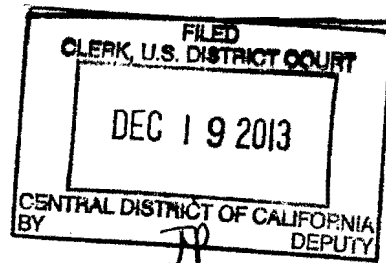
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7 Attorneys for Plaintiff,
8 Playboy Enterprises International, Inc.

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 **CV 13-9349** *AGR*

12 **PLAYBOY ENTERPRISES**
13 **INTERNATIONAL, INC.,** a California
corporation,

Case No.

COMPLAINT FOR COPYRIGHT
INFRINGEMENT (17 U.S.C. § 501)

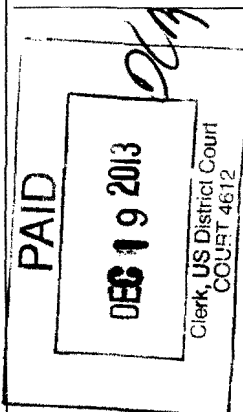
14 Plaintiffs,

15 v.

DEMAND FOR JURY TRIAL

17 **LE BOOK PUBLISHING, INC.,** a New
18 **York corporation; and DOES 1-10,**
inclusive,

19 Defendants.



1 PLAYBOY ENTERPRISES INTERNATIONAL, INC. ("Playboy"), by and through
2 its attorneys of record, complains against LE BOOK PUBLISHING, INC. ("Le Book"), a
3 New York corporation; and DOES 1 through 10, (collectively, "Defendants") as follows:

4 **JURISDICTION AND VENUE**

5 1. This is a civil action seeking damages and injunctive relief against Defendants
6 Le Book and DOES 1 through 10 for willful copyright infringement in violation of the
7 Copyright Act, 17 U.S.C. §§ 101 *et seq.*

8 2. This Court has subject matter jurisdiction under the Copyright Act, 17 U.S.C.
9 §§ 101 *et seq.*, 28 U.S.C. § 1331 (federal question) and 28 U.S.C. § 1338(a) (copyright).

10 3. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and (c) and 28
11 U.S.C. § 1400(a) in that the claim arises in this Judicial District, the Defendants may be
12 found and transact business in this Judicial District, and the injury suffered by Plaintiff took
13 place in this Judicial District.

14 4. Defendants are subject to the general and specific personal jurisdiction of this
15 Court because of their extensive contacts with the State of California. Specifically, and
16 inter alia, Defendants have engaged in direct, contributory, vicarious, and/or otherwise
17 induced acts of copyright infringement in this judicial district. Further, Defendants have
18 engaged in continuous and systematic business in California and, upon information and
19 belief, derive substantial revenues from commercial activities in California. Plaintiff is
20 informed and believes and, upon such, alleges that Defendants have also engaged in a
21 multiplicity of acts directed toward California, including without limitation: soliciting and
22 engaging in numerous commercial transactions in California and with California
23 businesses, publishing an edition—Le Book West Coast—that specifically targets California
24 individuals and business, using the lure of infringing materials to openly encourage
25 California users to visit its website, www.lebook.com, and organizing and hosting events,
26 including "global-scale" trade shows, in this judicial district. As a result, there is a direct
27 and substantial nexus between Playboy's claims in this case and Defendants' transaction of
28 business with Californians.

1 **PARTIES**

2 5. Plaintiff Playboy is a corporation formed under the laws of the state of
3 Delaware with its principal place of business in this judicial district at 9346 Civic Center
4 Drive, Suite 200, Beverly Hills, California 90210.

5 6. Plaintiff is informed and believes and, upon such, alleges that Defendant Le
6 Book is a corporation organized under the laws of the state of New York with its corporate
7 office at 552 Broadway 6th Floor, New York, New York 10012.

8 **FACTS COMMON TO ALL COUNTS**

9 *Playboy's Iconic Photographs of Kate Moss*

10 7. In December of 1953, the first issue of Playboy magazine hit the newsstands.
11 With superstar Marilyn Monroe gracing its cover, the periodical quickly made an indelible
12 mark on the international cultural landscape. Sixty years later, the magazine is still thriving
13 and, to celebrate its diamond anniversary, Playboy selected another global icon—
14 supermodel Kate Moss—to appear on the cover of its special Sixtieth Anniversary issue
15 and in an unprecedented, 18-page feature spread.

16 8. Playboy commissioned noted fashion photographers Marcus Pigott and Mert
17 Atlas to take the images of Ms. Moss (“the Photos”) and they delivered stunning results
18 that channeled the magazine’s trademark iconography, including the traditional Playboy
19 Bunny ensemble, in a series of bold and captivating color and black-and-white images.
20 Since the Sixtieth Anniversary issue’s recent release, the Photos have received widespread
21 critical acclaim and praise as instant classics. The Photos therefore carry tremendous
22 economic value and cultural resonance.

23 9. Marcus Pigott and Mert Atlas are the authors of the Photos and Playboy is the
24 exclusive licensee thereto and has secured the rights to the Photos, has complied with all
25 necessary provisions of the Copyright Act, 17 U.S.C. §101, et seq., and has registered the
26 copyrights thereto with the Copyright Office. On or about August 8, 2013, the Photos were
27 preregistered with the United States Copyright Office and acknowledgement thereof was
28 received as Preregistration Number PRE0000006560. On December 2 and December 10,

1 2013, the Photos were timely registered with the United States Copyright Office and
2 acknowledgement thereof was received as case numbers 1-1045269067 and 1-1064671402.

3 *The Defendants and Their Willful Infringing Activity*

4 10. Defendant Le Book bills itself as a leading provider, curator and portal for
5 "photography, film, video production and event-related services" for over 50,000 creative
6 professionals, including "the most famed photographers, art directors, stylists and model
7 agencies; the most lauded producers, locational finders, photo labs, rental studios, event
8 spaces and caterers; the pre-eminent record labels, magazines, advertising agencies, fashion
9 designers and PR firms." Le Book purports to possess "an unparalleled global presence,"
10 and, among other things, in 2010, launched an edition entitled "Le Book West Coast" that
11 targets the creative community in Southern California and, in 2011, organized and hosted
12 Connections, a "global-scale tradeshow for the creative community that features thousands
13 of artists, portfolios, and professionals," in this judicial district.

14 11. As a self-described "must for everything and everyone that propels the
15 creative industry," Le Book is a sophisticated corporation operating at the upper echelons
16 of the creative world and, as such, is readily familiar with the strictures of federal copyright
17 law.

18 12. Despite their sophistication on basic matters of intellectual property law,
19 Defendants have violated federal law by willfully infringing the copyrights to the Photos.
20 Specifically, and inter alia, Defendants have reproduced, distributed and publicly displayed
21 the Photo, and derivative thereof, on their website without permission, consent or license
22 from Plaintiff, the exclusive rightsholder to the Photos, and have therefore directly
23 infringed Playboy's rights thereto.

24 13. Specifically, Defendants own and operate the website located at the URL
25 <http://www.lebook.com>, where they have reproduced, distributed and publicly displayed
26 high-resolution copies of the Playboy cover with Kate Moss and the entire 18 page-spread
27 featuring the Photos of Kate Moss *in toto*, including the entire text and interview with Kate
28 Moss. On information and belief, the infringing materials appeared on their website only

1 days, if not hours, after Playboy's release of its special Sixtieth Anniversary issue. The
2 brazenness of the infringement is further magnified by the fact that the infringement
3 appears to be the product of direct, high resolution reproduction/scanning of Playboy's
4 magazine, as even the page numbers therefrom appear in the infringing images.

5 14. To make matters worse, Le Book conveniently provides browsers of its
6 infringing content with a series of icons and options just below the Photos. Inter alia, these
7 icons and options enable users to blow up the Photos into even larger, high-resolution
8 shots, print their own (infringing) copies of the entire spread, and "share" the infringing
9 content with others via email and social networks such as Facebook. In the process,
10 therefore, Defendants have not just willfully and directly infringed Playboy's copyrights;
11 they have also enabled and facilitated countless additional acts of infringement by third
12 parties.

13 15. Defendants possess no valid permission, consent, or license to reproduce,
14 publicly display, distribute or make any other use of the Photos. As such, Defendants'
15 unauthorized exploitation of the Photo violates of Playboy's exclusive rights to the Photos,
16 as secured under the Copyright Act, 17 U.S.C. § 106, and constitutes wholesale copyright
17 infringement.

18 16. It is unknown how long these alleged violations have been occurring.
19 However, violation of Playboy's exclusive rights under 17 U.S.C. § 106 appear to be on-
20 going, wanton and in willful disregard of Playboy's legal rights.

21 **FIRST CLAIM FOR RELIEF**

22 **(Copyright Infringement, 17 U.S.C. § 501)**

23 17. Plaintiff Playboy incorporates here by reference the allegations in paragraphs
24 1 through 16 above.

25 18. Playboy is the exclusive licensee of copyrights to the Photos, which
26 substantially consist of material wholly original with its authors and which are copyright
27 subject matter under the laws of the United States. Playboy has complied in all respects
28 with the Copyright Act and all of the laws of the United States governing copyrights. The

1 Photos have been timely registered with the United States Copyright Office.

2 19. Defendants have directly, vicariously and/or contributorily infringed, and
3 unless enjoined, will continue to infringe Playboy's copyrights by reproducing, displaying,
4 distributing and utilized the Photos for purposes of trade violation of 17 U.S.C. § 501 *et*
5 *seq.*

6 20. Defendants have willfully infringed, and unless enjoined, will continue to
7 infringe Playboy's copyrights by knowingly reproducing, displaying, distributing and
8 utilizing the Photos for purposes of trade.

9 21. Defendants have also knowingly induced, caused or materially contributed to
10 the infringing conduct of third parties and/or have obtained a direct financial benefit
11 therefrom while possessing the right and ability to control the infringing conduct of third
12 parties.

13 22. Defendants have received substantial benefits in connection with the
14 unauthorized reproduction, display, distribution and utilization of the Photos for purposes
15 of trade, including the procurement of illicitly and improperly obtained licensing fees.

16 23. All of the Defendant's acts are and were performed without the permission,
17 license or consent of Playboy.

18 24. The said wrongful acts of Defendants have caused, and are causing, great
19 injury to Playboy, which damage cannot be accurately computed, and unless this Court
20 restrains Defendants from further commission of said acts, Playboy will suffer irreparable
21 injury, for all of which it is without an adequate remedy at law. Accordingly, Playboy
22 seeks a declaration that Defendants are infringing Playboy's copyrights and an order under
23 17 U.S.C. § 502 enjoining Defendants from any further infringement of Playboy's
24 copyrights.

25 25. As a result of the acts of Defendants alleged herein, Playboy has suffered and
26 is suffering substantial damage to its business in the form of diversion of trade, loss of
27 profits, injury to goodwill and reputation, and the dilution of the value of its rights, all of
28 which are not yet fully ascertainable.

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1 504 (a)(1) & (b).

2 5. For statutory damages for copyright infringement, including willful
3 infringement, in accordance with 17 U.S.C. §§ 504(a)(2) & (c).

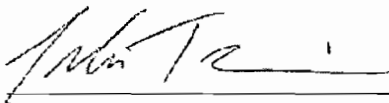
4 6. For costs and interest pursuant to 17 U.S.C. §§ 504 (a)(1) & (b), 505.

5 7. For reasonable attorneys' fees incurred herein pursuant to 17 U.S.C. § 505.

6 8. For any such other and further relief as the Court may deem just and
7 appropriate.

8
9 Dated: December 18, 2013

ONE LLP

10
11 By: 
12 John Tehranian
13 Attorneys for Plaintiff,
14 Playboy Enterprises International, Inc.
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Dated: December 18, 2013

By:

John Tehranian
Attorney for Plaintiff,
Playboy Enterprises International, Inc.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEETI. (a) PLAINTIFFS (Check box if you are representing yourself ☐)

PLAYBOY ENTERPRISES INTERNATIONAL, INC., a California corporation,

DEFENDANTS (Check box if you are representing yourself ☐)

LE BOOK PUBLISHING, INC., a New York corporation; and DOES 1-10, inclusive,

(b) County of Residence of First Listed Plaintiff Los Angeles

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

ONE LLP
4000 MACARTHUR BLVD., EAST TOWER, STE. 500
NEWPORT BEACH, CA 92660
(949) 502-2870

Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

II. BASIS OF JURISDICTION (Place an X in one box only.)

- ☐ 1. U.S. Government Plaintiff ☒ 3. Federal Question (U.S. Government Not a Party)
- ☐ 2. U.S. Government Defendant ☐ 4. Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only
(Place an X in one box for plaintiff and one for defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN (Place an X in one box only.)

- ☒ 1. Original Proceeding ☐ 2. Removed from State Court ☐ 3. Remanded from Appellate Court ☐ 4. Reinstated or Reopened ☐ 5. Transferred from Another District (Specify) ☐ 6. Multi-District Litigation

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check "Yes" only if demanded in complaint.)CLASS ACTION under F.R.Cv.P. 23: ☐ Yes ☒ No ☒ MONEY DEMANDED IN COMPLAINT: \$ To be determined

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

COPYRIGHT INFRINGEMENT UNDER THE U.S. COPYRIGHT ACT, 17 U.S.C. §§ 101, ET SEQ.

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/Etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org. <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.) <input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 American with Disabilities-Employment <input type="checkbox"/> 446 American with Disabilities-Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee Conditions of Confinement FORFEITURE/PENALTY <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Ret. Inc. Security Act	<input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405 (g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405 (g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

FOR OFFICE USE ONLY:

Case Number

CV-71 (11/13)

CIVIL COVER SHEET

Page 1 of 3

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

Question A: Was this case removed from state court? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	STATE CASE WAS PENDING IN THE COUNTY OF: <input type="checkbox"/> Los Angeles <input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo <input type="checkbox"/> Orange <input type="checkbox"/> Riverside or San Bernardino	INITIAL DIVISION IN CACD IS: Western Western Southern Eastern
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Question B: Is the United States, or one of its agencies or employees, a party to this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	If the United States, or one of its agencies or employees, is a party, is it: <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%;">A PLAINTIFF?</th> <th style="width: 50%;">A DEFENDANT?</th> </tr> <tr> <td style="text-align: center;">Then check the box below for the county in which the majority of DEFENDANTS reside.</td> <td style="text-align: center;">Then check the box below for the county in which the majority of PLAINTIFFS reside.</td> </tr> <tr> <td><input type="checkbox"/> Los Angeles</td> <td><input type="checkbox"/> Los Angeles</td> </tr> <tr> <td><input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo</td> <td><input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo</td> </tr> <tr> <td><input type="checkbox"/> Orange</td> <td><input type="checkbox"/> Orange</td> </tr> <tr> <td><input type="checkbox"/> Riverside or San Bernardino</td> <td><input type="checkbox"/> Riverside or San Bernardino</td> </tr> <tr> <td><input type="checkbox"/> Other</td> <td><input type="checkbox"/> Other</td> </tr> </table>		A PLAINTIFF?	A DEFENDANT?	Then check the box below for the county in which the majority of DEFENDANTS reside.	Then check the box below for the county in which the majority of PLAINTIFFS reside.	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Other	<input type="checkbox"/> Other	INITIAL DIVISION IN CACD IS: Western Western Southern Eastern Western
A PLAINTIFF?	A DEFENDANT?																
Then check the box below for the county in which the majority of DEFENDANTS reside.	Then check the box below for the county in which the majority of PLAINTIFFS reside.																
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Question C: Location of plaintiffs, defendants, and claims? (Make only one selection per row)	A. Los Angeles County	B. Ventura, Santa Barbara, or San Luis Obispo Counties	C. Orange County	D. Riverside or San Bernardino Counties	E. Outside the Central District of California	F. Other
Indicate the location in which a majority of plaintiffs reside:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of claims arose:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

C.1. Is either of the following true? If so, check the one that applies: <input type="checkbox"/> 2 or more answers in Column C <input type="checkbox"/> only 1 answer in Column C and no answers in Column D Your case will initially be assigned to the SOUTHERN DIVISION. Enter "Southern" in response to Question D, below. If none applies, answer question C2 to the right. ➔	C.2. Is either of the following true? If so, check the one that applies: <input type="checkbox"/> 2 or more answers in Column D <input type="checkbox"/> only 1 answer in Column D and no answers in Column C Your case will initially be assigned to the EASTERN DIVISION. Enter "Eastern" in response to Question D, below. If none applies, go to the box below. ⬇
Your case will initially be assigned to the WESTERN DIVISION. Enter "Western" in response to Question D below.	

Question D: Initial Division? Enter the initial division determined by Question A, B, or C above: ➔	INITIAL DIVISION IN CACD WESTERN
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**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

IX(a). IDENTICAL CASES: Has this action been previously filed **in this court** and dismissed, remanded or closed? ☒ NO ☐ YES

If yes, list case number(s): _____

IX(b). RELATED CASES: Have any cases been previously filed **in this court** that are related to the present case? ☒ NO ☐ YES

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

X. SIGNATURE OF ATTORNEY

(OR SELF-REPRESENTED LITIGANT):


John Tehranian

DATE: December 18, 2013

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))